

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**DEFENDANT GOOGLE LLC’S OBJECTIONS TO PLAINTIFFS’ COUNTER
DEPOSITION TESTIMONY DESIGNATIONS, AND GOOGLE’S “FAIRNESS”
DESIGNATIONS**

Pursuant to the Court’s Order Modifying the Pretrial Schedule entered on June 24, 2024, ECF No. 871, Rule 26(a)(3) of the Federal Rules of Civil Procedure, and Local Civil Rule 30, Defendant Google LLC hereby submits its objections and “fairness” designations to Plaintiffs’ counter deposition designations, dated July 19, 2024. *See* ECF No. 917-2. The objections and reply designations are contained in the attached exhibit. The objection codes are as follows:

Code	Objection
30b6	Outside the scope of FRCP 30(b)(6) topics
103	Assumes facts not in evidence
106	Incomplete excerpt or designation
402	Irrelevant
403	Unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence
602	Calls for speculation; speculative; lack of personal knowledge
611b	Beyond the scope of direct
611c	Leading
701	Improper opinion by lay witness
802	Hearsay
805	Hearsay within hearsay

Google reserves the right to amend and/or supplement the attached fairness designations and objections, including with respect to the Court's rulings on motions *in limine* or other pre-trial rulings, as well as in the event a witness whom Google intends to call live is unable to testify live and may only appear by deposition. Google also reserves the right to introduce or use any of Plaintiffs' designations or counter designations at trial, including as Google's counter designations, to the extent Plaintiffs do not do so. Google further incorporates by reference herein its deposition designations, objections to Plaintiffs' designations, and counter designations as filed on July 5, 2024 and July 19, 2024, respectively. *See* ECF No. 893; ECF No. 917-2.

Dated: July 26, 2024

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Counsel for Defendant Google LLC

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Krishan Bhatia	2023.09.21	68	7	69	8	Highly Confidential		
Krishan Bhatia	2023.09.21	69	23	70	2	Public	602, 611b	
Krishan Bhatia	2023.09.21	70	7	70	8	Highly Confidential	602, 611b	
Krishan Bhatia	2023.09.21	70	10	70	16	Highly Confidential	602, 611b	
Krishan Bhatia	2023.09.21	78	10	78	11	Public		
Krishan Bhatia	2023.09.21	78	18	79	5	Highly Confidential		
Krishan Bhatia	2023.09.21	79	6	79	21	Highly Confidential		
Krishan Bhatia	2023.09.21	93	16	93	23	Highly Confidential	602, 611b	
Krishan Bhatia	2023.09.21	145	2	145	11	Public		
Krishan Bhatia	2023.09.21	146	17	146	20	Public		
Krishan Bhatia	2023.09.21	147	2	147	9	Public		
Krishan Bhatia	2023.09.21	153	9	153	12	Public		
Krishan Bhatia	2023.09.21	153	15	153	21	Public		
Krishan Bhatia	2023.09.21	153	23	154	4	Highly Confidential		
Krishan Bhatia	2023.09.21	154	5	154	15	Highly Confidential		
Krishan Bhatia	2023.09.21	157	14	157	16	Public	602	
Krishan Bhatia	2023.09.21	157	19	157	22	Public	602	
Krishan Bhatia	2023.09.21	158	22	159	16	Highly Confidential		
Krishan Bhatia	2023.09.21	167	23	168	3	Public	602, 611b	
Krishan Bhatia	2023.09.21	168	8	168	13	Highly Confidential	602, 611b	
Krishan Bhatia	2023.09.21	168	15	169	4	Highly Confidential	602, 611b	173:8-13
Krishan Bhatia	2023.09.21	191	15	191	15	Public		
Krishan Bhatia	2023.09.21	191	24	191	25	Public		

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Omri Farber	2023.09.18	24	6	24	22	Confidential		
Omri Farber	2023.09.18	47	7	47	14	Highly Confidential		47:22-47:25; 48:3-48:10
Omri Farber	2023.09.18	49	17	49	21	Highly Confidential		
Omri Farber	2023.09.18	53	6	53	11	Public		
Omri Farber	2023.09.18	60	6	60	10	Public	611b, 611c	
Omri Farber	2023.09.18	60	11	60	22	Public	611b, 611c	
Omri Farber	2023.09.18	60	23	61	1	Public	611b, 611c	
Omri Farber	2023.09.18	116	21	117	2	Confidential	611b, 611c, 106	
Omri Farber	2023.09.18	117	14	117	16	Confidential	611b, 611c, 402	
Omri Farber	2023.09.18	117	21	118	2	Confidential	611b, 611c, 402	
Omri Farber	2023.09.18	156	14	156	19	Highly Confidential		
Omri Farber	2023.09.18	199	5	199	6	Highly Confidential	611b, 611c	
Omri Farber	2023.09.18	199	8	199	11	Highly Confidential	611b, 611c	
Omri Farber	2023.09.18	233	22	234	7	Highly Confidential		
Omri Farber	2023.09.18	253	25	254	1	Confidential	602	
Omri Farber	2023.09.18	254	4	254	8	Confidential	602	
Omri Farber	2023.09.18	281	7	281	11	Confidential	611b, 611c	
Omri Farber	2023.09.18	283	12	283	15	Confidential	611b, 611c	
Omri Farber	2023.09.18	283	18	283	24	Highly Confidential	611b, 611c	

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Jay Glogovsky	2023.08.25	43	20	44	2	Confidential		
Jay Glogovsky	2023.08.25	52	8	52	10	Confidential		
Jay Glogovsky	2023.08.25	53	13	53	15	Confidential		
Jay Glogovsky	2023.08.25	53	17	53	25	Confidential		
Jay Glogovsky	2023.08.25	54	2	54	4	Confidential		
Jay Glogovsky	2023.08.25	54	24	54	25	Confidential		
Jay Glogovsky	2023.08.25	55	2	55	7	Confidential		
Jay Glogovsky	2023.08.25	59	19	59	25	Confidential		
Jay Glogovsky	2023.08.25	60	2	60	5	Confidential		
Jay Glogovsky	2023.08.25	62	6	62	14	Confidential		
Jay Glogovsky	2023.08.25	62	15	62	16	Confidential		
Jay Glogovsky	2023.08.25	66	5	66	7	Confidential	611b	
Jay Glogovsky	2023.08.25	66	10	66	13	Confidential	611b	
Jay Glogovsky	2023.08.25	66	14	66	18	Confidential	611b	
Jay Glogovsky	2023.08.25	68	3	68	9	Confidential	602, 611b	
Jay Glogovsky	2023.08.25	68	12	68	19	Confidential	602, 611b	
Jay Glogovsky	2023.08.25	75	17	75	20	Confidential		
Jay Glogovsky	2023.08.25	85	5	85	8	Confidential		
Jay Glogovsky	2023.08.25	87	12	87	16	Confidential		
Jay Glogovsky	2023.08.25	89	4	89	9	Confidential	611b	
Jay Glogovsky	2023.08.25	89	12	89	13	Confidential	611b	
Jay Glogovsky	2023.08.25	89	15	89	15	Confidential	611b	
Jay Glogovsky	2023.08.25	89	16	89	25	Confidential	611b	
Jay Glogovsky	2023.08.25	90	2	90	2	Confidential	611b	
Jay Glogovsky	2023.08.25	90	3	90	3	Confidential	611b	
Jay Glogovsky	2023.08.25	90	5	90	9	Confidential	611b	
Jay Glogovsky	2023.08.25	96	11	96	15	Confidential		
Jay Glogovsky	2023.08.25	96	17	96	21	Confidential		
Jay Glogovsky	2023.08.25	100	8	100	9	Confidential		
Jay Glogovsky	2023.08.25	100	11	100	15	Confidential		
Jay Glogovsky	2023.08.25	100	16	100	17	Confidential		
Jay Glogovsky	2023.08.25	100	19	100	19	Confidential		
Jay Glogovsky	2023.08.25	101	12	102	2	Confidential		
Jay Glogovsky	2023.08.25	107	11	107	12	Confidential	602	
Jay Glogovsky	2023.08.25	107	14	107	16	Confidential	602	
Jay Glogovsky	2023.08.25	108	13	108	15	Confidential		
Jay Glogovsky	2023.08.25	108	17	108	18	Confidential		
Jay Glogovsky	2023.08.25	112	5	112	6	Confidential		
Jay Glogovsky	2023.08.25	112	9	112	15	Confidential		
Jay Glogovsky	2023.08.25	119	22	119	25	Confidential		
Jay Glogovsky	2023.08.25	157	22	158	2	Confidential		
Jay Glogovsky	2023.08.25	158	3	158	5	Confidential	611b	
Jay Glogovsky	2023.08.25	158	8	158	10	Confidential	611b	
Jay Glogovsky	2023.08.25	166	8	166	10	Confidential	602, 802	
Jay Glogovsky	2023.08.25	166	13	167	3	Confidential	602, 802	
Jay Glogovsky	2023.08.25	167	24	168	11	Confidential		
Jay Glogovsky	2023.08.25	179	18	180	4	Confidential	602	

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Jay Glogovsky	2023.08.25	181	14	181	18	Confidential		
Jay Glogovsky	2023.08.25	181	21	182	11	Confidential		
Jay Glogovsky	2023.08.25	182	12	182	16	Confidential		
Jay Glogovsky	2023.08.25	186	7	186	10	Confidential		
Jay Glogovsky	2023.08.25	186	13	186	14	Public		
Jay Glogovsky	2023.08.25	277	7	277	9	Confidential		
Jay Glogovsky	2023.08.25	277	11	277	13	Confidential		
Jay Glogovsky	2023.08.25	277	24	278	3	Confidential		
Jay Glogovsky	2023.08.25	278	6	278	13	Confidential		

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Kristy Kozlowski	2023.09.06	34	24	35	19	Public	611b, 602	
Kristy Kozlowski	2023.09.06	35	20	35	24	Public	611b, 602	
Kristy Kozlowski	2023.09.06	36	3	36	3	Public	611b, 602	
Kristy Kozlowski	2023.09.06	36	5	36	13	Public	611b	
Kristy Kozlowski	2023.09.06	36	14	37	6	Public	611b	
Kristy Kozlowski	2023.09.06	37	16	37	23	Public		
Kristy Kozlowski	2023.09.06	41	21	42	23	Public	611b	
Kristy Kozlowski	2023.09.06	45	3	46	14	Public		
Kristy Kozlowski	2023.09.06	46	15	47	1	Public	611b	
Kristy Kozlowski	2023.09.06	47	2	47	8	Public	611b	
Kristy Kozlowski	2023.09.06	47	10	47	10	Public	611b	
Kristy Kozlowski	2023.09.06	47	11	48	10	Public	611b	
Kristy Kozlowski	2023.09.06	48	11	48	17	Public	602	
Kristy Kozlowski	2023.09.06	49	6	50	3	Public		
Kristy Kozlowski	2023.09.06	50	4	50	7	Public		
Kristy Kozlowski	2023.09.06	50	8	50	16	Public		
Kristy Kozlowski	2023.09.06	50	18	50	24	Public		
Kristy Kozlowski	2023.09.06	60	8	61	2	Highly Confidential		51:5-19; 51:20-23; 51:25; 52:1-4; 52:6-15; 52:21-53:9; 53:12-14; 59:16-60:4; 60:7
Kristy Kozlowski	2023.09.06	73	19	74	6	Highly Confidential		
Kristy Kozlowski	2023.09.06	86	19	86	21	Public		
Kristy Kozlowski	2023.09.06	97	15	98	16	Highly Confidential	611b	99:8-12; 99:13-25; 100:3-22
Kristy Kozlowski	2023.09.06	185	15	185	22	Public		
Kristy Kozlowski	2023.09.06	186	2	186	21	Highly Confidential	611b (186:2-186:13) 106, 611b (186:14-21)	
Kristy Kozlowski	2023.09.06	186	24	187	2	Public	611b	
Kristy Kozlowski	2023.09.06	187	4	188	15	Highly Confidential	611b	
Kristy Kozlowski	2023.09.06	188	16	188	20	Public		
Kristy Kozlowski	2023.09.06	188	22	188	22	Public		188:23-189:2
Kristy Kozlowski	2023.09.06	189	24	191	9	Highly Confidential	611b	
Kristy Kozlowski	2023.09.06	217	14	217	19	Highly Confidential	611b	
Kristy Kozlowski	2023.09.06	217	20	217	21	Public	611b	
Kristy Kozlowski	2023.09.06	217	23	217	23	Public	611b	
Kristy Kozlowski	2023.09.06	217	24	218	7	Highly Confidential	611b	
Kristy Kozlowski	2023.09.06	229	20	230	4	Public	611b	

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David A. Minkin	2023.09.22	47	8	47	17	Public		
David A. Minkin	2023.09.22	54	10	54	13	Public		
David A. Minkin	2023.09.22	54	17	54	21	Public		
David A. Minkin	2023.09.22	55	16	55	23	Public		
David A. Minkin	2023.09.22	57	9	57	15	Public		
David A. Minkin	2023.09.22	57	16	57	22	Public		
David A. Minkin	2023.09.22	58	17	58	19	Public	602	
David A. Minkin	2023.09.22	58	21	58	23	Public	602	
David A. Minkin	2023.09.22	67	19	67	20	Public		
David A. Minkin	2023.09.22	67	22	68	10	Public		
David A. Minkin	2023.09.22	68	15	68	18	Public	602	
David A. Minkin	2023.09.22	68	20	68	22	Public		
David A. Minkin	2023.09.22	68	23	69	10	Highly Confidential		
David A. Minkin	2023.09.22	114	14	114	16	Public		
David A. Minkin	2023.09.22	117	15	117	19	Public		
David A. Minkin	2023.09.22	127	9	127	15	Highly Confidential		127:16-23; 127:25
David A. Minkin	2023.09.22	130	3	130	20	Highly Confidential		130:24-131:3
David A. Minkin	2023.09.22	145	10	145	18	Highly Confidential		
David A. Minkin	2023.09.22	154	8	154	9	Public		
David A. Minkin	2023.09.22	154	11	154	13	Public		
David A. Minkin	2023.09.22	178	17	178	22	Highly Confidential		
David A. Minkin	2023.09.22	178	23	179	11	Highly Confidential		
David A. Minkin	2023.09.22	179	15	179	18	Highly Confidential		
David A. Minkin	2023.09.22	179	19	179	21	Highly Confidential		
David A. Minkin	2023.09.22	186	18	186	20	Public		

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Adam Soroca	2023.08.31	61	9	61	10	Public	402, 602, 701	
Adam Soroca	2023.08.31	61	12	61	15	Public	402, 602, 701	
Adam Soroca	2023.08.31	61	16	61	16	Public	611b, 402, 602, 701	
Adam Soroca	2023.08.31	61	18	61	20	Public	611b, 402, 602, 701	
Adam Soroca	2023.08.31	61	21	62	1	Public	611b, 402, 602, 701	
Adam Soroca	2023.08.31	62	3	62	3	Public	611b, 402, 602, 701	
Adam Soroca	2023.08.31	102	13	102	15	Public	402, 602, 701	
Adam Soroca	2023.08.31	102	18	102	19	Public	402, 602, 701	
Adam Soroca	2023.08.31	102	20	103	3	Public	402, 602, 701	
Adam Soroca	2023.08.31	192	19	192	19	Public	611b	
Adam Soroca	2023.08.31	192	21	192	22	Public	611b	
Adam Soroca	2023.08.31	193	1	193	2	Public	611b	
Adam Soroca	2023.08.31	193	4	193	5	Public	611b	
Adam Soroca	2023.08.31	193	6	193	8	Highly Confidential	611b	
Adam Soroca	2023.08.31	193	10	193	10	Public	611b	
Adam Soroca	2023.08.31	193	11	193	15	Highly Confidential	611b	
Adam Soroca	2023.08.31	193	16	193	18	Highly Confidential	611b	
Adam Soroca	2023.08.31	193	20	193	20	Highly Confidential	611b	
Adam Soroca	2023.08.31	193	21	193	22	Highly Confidential	611b	
Adam Soroca	2023.08.31	194	1	194	2	Public	611b, 106	194:4

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Simon Whitcombe	2023.09.28	9	6	9	9	Confidential		
Simon Whitcombe	2023.09.28	11	18	11	25	Confidential		
Simon Whitcombe	2023.09.28	12	10	12	16	Confidential		
Simon Whitcombe	2023.09.28	16	14	16	21	Confidential		
Simon Whitcombe	2023.09.28	29	25	30	11	Confidential		
Simon Whitcombe	2023.09.28	31	17	31	25	Confidential		
Simon Whitcombe	2023.09.28	32	2	32	8	Confidential		
Simon Whitcombe	2023.09.28	33	25	34	19	Confidential		
Simon Whitcombe	2023.09.28	37	10	37	16	Confidential		37:17-37:19; 37:21
Simon Whitcombe	2023.09.28	52	4	52	13	Confidential	611b	
Simon Whitcombe	2023.09.28	52	16	53	5	Confidential	611b	
Simon Whitcombe	2023.09.28	74	16	74	17	Highly Confidential		
Simon Whitcombe	2023.09.28	74	20	75	11	Highly Confidential		
Simon Whitcombe	2023.09.28	77	9	77	16	Confidential		
Simon Whitcombe	2023.09.28	102	12	102	15	Confidential		
Simon Whitcombe	2023.09.28	102	17	103	4	Confidential		
Simon Whitcombe	2023.09.28	122	16	122	23	Confidential	611b, 611c, 802	
Simon Whitcombe	2023.09.28	141	18	141	23	Confidential	611b, 611c, 402, 602, 701, 802	
Simon Whitcombe	2023.09.28	221	17	221	21	Confidential		
Simon Whitcombe	2023.09.28	227	19	228	2	Confidential		
Simon Whitcombe	2023.09.28	243	3	243	7	Highly Confidential		
Simon Whitcombe	2023.09.28	243	10	243	10	Highly Confidential		
Simon Whitcombe	2023.09.28	244	4	244	11	Highly Confidential		